

SWTP Mod 11

- Ends an interregnum
- Is a one-off, temporary solution
- Is associated with a large, apparently unauthorised, partially treated, mine water discharge of 18.5ML/day to lower the TCR to the 90% storage level (i.e. below LOL).






**Mt Piper Power Station condensers
enabled zero discharge mine water
management
– but not anymore –**

Regulatory Principles for mine wastewater management in the Lithgow Region

- 1/- If wastewater is to be discharged it must be cleansed to a state suitable to flow through a World Heritage Area and then be consumed as drinking water by five million Sydney residents. The change from cleansing wastewater for industrial reuse to cleansing for the highest level of environmental use, as well as enjoyment as drinking water, necessitates the highest level of wastewater treatment.
- 2/- The polluter must pay for treatment. Sydney Water consumers enjoy some of the best drinking water in world and Centennial Coal must not harm that enjoyment. Centennial Coal also has no right to harm aquatic life, especially that in the World Heritage Area. Centennial Coal must pay for improvements in wastewater cleansing to ensure clean, healthy, soft water is discharged.
- 3/- Government agencies ensure polluters comply with laws that protect aquatic life, including in the World Heritage Area, and that secure Sydney residents' right continue to enjoy some of the best drinking water in the world. Regulation must ensure that water cleansing facilities always operate at a capacity to achieve these water quality outcomes.
- 4/- Regulation must ensure wastewater management has no legacy issues. Wastewater discharges must be eliminated before the power plant and coal mines are decommissioned. Elimination of waste discharges must be part of an orderly, safe and equitable transition away from fossil fuels.



Effective Wastewater management would also protect infrastructure and the environment



TCR discharge, 14/3/2025

- Discharge standards should not be created, ad hoc, e.g. to enable approval of apparently unauthorised discharges
- Practically speaking, the “pre-release” discharge is a contingent part of Mod 11
- Once seen by determining authorities, it should not be ignored
- The consent modification “tail” must not wag the mine wastewater regulation “dog”

Springvale Water Treatment Plant

- In 2022 an average annual salinity performance of $274\mu\text{S}/\text{cm}$ was achieved for all waters transferred to the TCR and such a performance outcome should be the starting point of the regulatory framework for mine water discharges
- If approved, amended consent conditions should extinguish Modification 11 on expiry, so it can't be extended because the regulatory framework should require better outcomes for future discharges, including "pre-release" ones
- Amended consent conditions should require future comparisons of proposed discharges to be made with respect to the Coxs River waters upstream of EnergyAustralia and Centennial Coal discharges and seepages into receiving waters because receiving waters are part of Sydney's drinking water supply

